

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION**

JESSICA JONES, et al.,

Plaintiffs,

v.

VARSITY BRANDS, LLC, et al.

Defendants.

Case No. 2:20-cv-02892-SHL-tmp

**INDIRECT PURCHASER PLAINTIFFS' MOTION FOR AN AWARD
OF ATTORNEYS' FEES, FOR REIMBURSMENT OF EXPENSES, AND FOR
SERVICE AWARDS FOR THE CLASS REPRESENTATIVES**

Indirect Purchaser Plaintiffs (“IPPs” or “Class Representatives”) Christina Lorenzen, Jessica Jones, and Amy Coulson, by and through Class Counsel,¹ hereby move this Court for an award of attorneys’ fees, for reimbursement of expenses, and for service awards for the Class Representatives from the proceeds of a settlement with Defendants Varsity Brands, LLC; Varsity Spirit, LLC; Varsity Spirit Fashions & Supplies, LLC; Charlesbank Capital Partners, LLC; Charlesbank Equity Fund VII, LP; Charlesbank Equity Fund VIII, LP; and Charlesbank Equity Fund IX, LP; Bain Capital Private Equity LP; Bain Capital Fund XII, L.P., Bain Capital Fund (DE) XII, L.P., and Bain Capital Fund (Lux) XII, SCSp, U.S. All Star Federation, Inc., and Jeff Webb, which settlement involved cash payments totaling \$82,500,000.00 in addition to prospective relief. In support of this motion, IPPs submit the following: (i) Memorandum of Law; (ii) Joint Declaration of Joseph R. Saveri, Jason S. Hartley, Richard M. Paul, Daniel E. Gustafson, and Van D. Turner, Jr.; (iii) Declaration of Joseph R. Saveri; (iv) Declaration of

¹ “Class Counsel” includes the five firms appointed Settlement Class Counsel by the Court: Joseph Saveri Law Firm, LLP; Hartley LLP, Paul LLP; Gustafson Gluek PLLC; and Turner Feild, PLLC. *See* ECF No. 612 at PageID 35672, ¶ 6.

Richard M. Paul III; (v) Declaration of Jason Hartley; (vi) Declaration of Daniel J. Nordin; (vii) Declaration of Van D. Turner, Jr.; and (viii) Declaration of J. Gerard Stranch, IV.

Dated: September 3, 2024

Respectfully submitted,

By: /s/ Joseph R. Saveri
Joseph R. Saveri

Joseph R. Saveri*
Ronnie Seidel Spiegel*+
David Seidel*
Kevin E. Rayhill*
Elissa A. Buchanan*
JOSEPH SAVERI LAW FIRM, LLP
601 California Street, Suite 1505
San Francisco, California 94108
Telephone: (415) 500-6800
Facsimile: (415) 395-9940
jsaveri@saverilawfirm.com
rspiegel@saverilawfirm.com
dseidel@saverilawfirm.com
krayhill@saverilawfirm.com
eabuchanan@saverilawfirm.com

Van Turner Jr. (TN Bar No. 22603)
TURNER FEILD, PLLC
2650 Thousand Oaks Blvd., Suite 2325
Memphis, Tennessee 38118
Telephone: (901) 290-6610
Facsimile: (901) 290-6611
VTurner@TurnerFeildLaw.com

Richard M. Paul III*
Ashlea Schwarz*
PAUL LLP
601 Walnut, Suite 300
Kansas City, Missouri 64106
Telephone: (816) 984-8100
rick@paulllp.com
ashlea@paulllp.com

Jason S. Hartley*
HARTLEY LLP

101 West Broadway, Suite 820
San Diego, CA 92101
Telephone: (619) 400-5822
hartley@hartleyllp.com

Daniel E. Gustafson*
Daniel C. Hedlund*
Daniel J. Nordin*
GUSTAFSON GLUEK PLLC
Canadian Pacific Plaza
120 South Sixth Street, Suite 2600
Minneapolis, MN 55402
Telephone: (612) 333-8844
Facsimile: (612) 339-6622
dgustafson@gustafsongluek.com
dhedlund@gustafsongluek.com
dnordin@gustafsongluek.com

* Admitted *pro hac vice*

+Located in Washington State

*Attorneys for Individual and
Representative Plaintiffs*